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18 *Attorneys for Plaintiff, CHANEL, INC.*

19 THE UNITED STATES DISTRICT COURT  
 20 FOR THE DISTRICT OF NEVADA

21 CHANEL, INC.,

22 Plaintiff,

23 v.

24 TIAYI ART, LLC, a Nevada limited  
 25 liability company, d/b/a TIAYI ART d/b/a  
 26 TIAYI ART GALLERY d/b/a TIAYI ART  
 27 CIRCUS FJ STORE d/b/a TIAYI ART –  
 28 TIAYI GALLERY d/b/a TIAYI ART  
 CHINATOWN MAIN STORE d/b/a  
 TIAYI ART CO. d/b/a TIAYI ART  
 COMPANY and DOES 1-10,

Defendants.

Case No. 2:13-cv-1274-APG/PAL

**STIPULATED CONSENT  
 PRELIMINARY INJUNCTION AND  
 ORDER CONFIRMING SEIZURE**




WHEREAS, this action having been commenced by Plaintiff, Chanel, Inc. ("Chanel")  
 against the Defendant, Tiayi Art, LLC, a Nevada limited liability company, d/b/a Tiayi Art d/b/a  
 Tiayi Art Gallery d/b/a Tiayi Art Circus FJ Store d/b/a Tiayi Art – Tiayi Gallery d/b/a Tiayi Art

Chinatown Main Store d/b/a Tiayi Art Co. d/b/a Tiayi Art Company (the "Defendant"), alleging *inter alia*, trademark counterfeiting and trademark infringement, and false designation of origin and a copy of the Summons, Verified Complaint, Temporary Restraining Order and Seizure Order, supporting papers, and Orders issued to date having been served upon the Defendant:

IT IS STIPULATED, ORDER, ADJUDGED AND DECREED that:

1. This Court has jurisdiction of the subject matter of all counts of this action and over all of the named parties hereto.

2. Chanel is the owner of the following trademark (the "Chanel Marks") in connection with high quality costume jewelry, including earrings, necklaces, and bracelets and hair accessories, including hair clips:

Trademark	Registration Number	Registration Date	Class(es)/Goods
	1,501,898	August 30, 1988	IC 06 - Keychains IC 14 - Costume Jewelry IC 16 - Gift wrapping paper IC 25 - Blouses, shoes, belts, scarves, jackets, men's ties IC 26 - Brooches, buttons for clothing
CHANEL	3,133,139	August 22, 2006	IC 14 - Jewelry and Watches
CHANEL	0,902,190	November 10, 1970	IC 14 - Bracelets, Pins and Earrings
	3,025,936	December 13, 2005	IC 09 - Eyeglass frames, sunglasses IC 25 - Gloves, swimwear IC 26 - Hair Accessories, Namely Barrettes
<b>CHANEL</b> 	1,464,711	January 22, 1987	IC 26- Barrettes, Hair Clips, Hair Bands, Hair Bows, and Artificial Flowers

1			IC 09 – Ski goggles, eyeglass frames, sunglasses, sunglass parts, cases for spectacles and sunglasses
2			IC 25 – Sun visors, swimwear, stockings and socks
3	CHANEL	3,134,695	IC 26 - Hair Accessories Namely Barrettes
4		October 8, 2004	IC 28 – Bags specially adopted for sports equipment, skis, tennis rackets, tennis balls, tennis racket covers
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7           3. Defendant and its respective officers, agents, servants, employees, and attorneys,  
8 and all persons in active concert and participation with them are hereby restrained and enjoined,  
9 pending termination of this action, from, intentionally and/or knowingly:

- 10           A. manufacturing or causing to be manufactured, importing, advertising, or  
11 promoting, distributing, selling or offering to sell counterfeit and infringing  
12 goods; bearing the Chanel Marks;
- 13           B. using the Chanel Marks in connection with the sale of any unauthorized  
14 goods;
- 15           C. using any logo, and/or layout which may be calculated to falsely advertise  
16 the services or products of the Defendant as being sponsored by,  
17 authorized by, endorsed by, or in any way associated with the Plaintiff;
- 18           D. using any reproduction, counterfeit, copy, or colorable imitation of the  
19 Chanel Marks in connection with the publicity, promotion, sale or  
20 advertising of any goods sold by the Defendant, including, without  
21 limitation, costume jewelry, including earrings, necklaces, and bracelets  
22 and hair accessories, including hair clips;
- 23           E. affixing, applying, annexing or using in connection with the sale of any  
24 goods, a false description or representation, including words or other  
25 symbols tending to falsely describe or represent the Defendant's goods as  
26 being those of the Plaintiff, or in any way endorsed by the Plaintiff;
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1 F. offering such goods in commerce; and from otherwise unfairly competing  
2 with the Plaintiff;

3 G. secreting, destroying, altering, removing, or otherwise dealing with the  
4 unauthorized products or any books or records which contain any  
5 information relating to the importing, manufacturing, producing,  
6 distributing, circulating, selling, marketing, offering for sale, advertising,  
7 promoting, renting or displaying of all unauthorized products which  
8 infringe the Chanel Marks; and

9 H. effecting assignments or transfers, forming new entities or associations or  
10 utilizing any other device for the purpose of circumventing or otherwise  
11 avoiding the prohibitions set forth in subparagraphs (A) through (G).

12 4. The seizure effected on July 26, 2013 pursuant to this Court's Order is hereby  
13 confirmed and the hearings scheduled for August 1, 2013 at 1:30 p.m. are hereby canceled.

14 5. The seal in this matter is hereby removed, and the Clerk is instructed to return this  
15 file to the public portion of the Court records.

16 6. The bond posted by the Plaintiff in compliance with the Court's Order dated July  
17 22, 2013 is hereby released.

18  
19 SO STIPULATED:

20 **Plaintiff: Chanel, Inc.**

21 DATED: July \_\_\_\_, 2013

WILSON, ELSE, MOSKOWITZ, EDELMAN  
& DICKER LLP

22  
23 By: 

Sheri Thome

24 **Defendant: Tiayi Art, LLC**

25 DATED: July 26, 2013

26 By: 

Printed Name: Guo Yucheng

Title: Manager  
Co. owner

1 **IT IS SO ORDERED.**

2 Dated: July 30, 2013.

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6 ANDREW P. GORDON  
7 UNITED STATES DISTRICT JUDGE  
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